CECOS INTERNATIONAL
2224 Tennmore Avenue
Buffalo, NY 14207
(716) 873-4200

May 17, 1983

Mr. John Jimenez
The U.S. Environmental Protection Agency
Region II - Enforcement Division
26 Federal Plaza
New York, New York

Dear Mr. Jimenez:

As can be seen by the attached documents, SK & F Laboratories has accepted the BFI-CECOS proposal for closure of the surface impoundments that had been constructed and used by SK & F for waste impoundment. Our plans for closure follow basically Closure Plan No. 1, as was very generally referred to in Section 7.1 (p. 145) of our Compliance Plan that has been submitted to Region II for approval. More specifically, and as is defined in Exhibit B of the attached Agreement between SK & F and BFI, the closure plan will be implemented by BFI-CECOS personnel in the following manner:

1. Deliquify in place the Waste Material using Kiln Dust.

2. Remove all Waste Material from the Waste Site, as well as the hypalon liner and any contaminated soil underlying and/or surrounding the Waste Site, as identified by SK & F.

3. Load and transport all Waste Material, the hypalon liner and contaminated soil in 40 ft. lined vans to the dock at Ponce, Puerto Rico in accordance with the legal requirements referenced in Exhibit C of this Agreement.

4. Load and transport all Waste Material, the hypalon liner and contaminated soil from the dock at Ponce via authorized barge to Port Arthur, Louisiana and from Port Arthur, Louisiana via lined vans to BFI's Calcasieu disposal facility in Westlake, Louisiana, in accordance with the legal requirements referenced in Exhibit C of this Agreement.

5. Dispose of all Waste Material, the hypalon liner and contaminated soil via direct burial at BFI's Calcasieu disposal facility in Westlake, Louisiana in accordance with the legal requirements referenced in Exhibit C of this Agreement.

6. Restore the Waste Site to its original contours, eliminating all surface impoundment areas.

Because the approval of the purchase order was received from SK & F by BFI on April 21, 1983, and because SK & F is extremely anxious for us to proceed immediately with this effort, we are submitting this information to you for your review and approval of this closure plan, based on our need to obtain your authorization prior to commencing any such activities.

We are hopeful that this outline is sufficient for your office to act on this issue so that we may proceed as expeditiously as possible with this remediation effort.

Thank you for your consideration.

Very truly yours,

CECOS INTERNATIONAL

James F LaDue

JAMES F. LaDUE
Vice President

JFL:klg
Enclosure

PART I - CLOSURE PLANS, POST-CLOSURE PLANS, AND FINANCIAL REQUIREMENTS

I-1 Closure Plans

A Copy of the written closure plan consistent with Items I-1a through I-1k.

I-1a Closure Performance Standard

A description of how closure

- o Minimizes the need for post-closure maintenance
- o Minimizes releases of hazardous wastes, leachate, and contaminated rainfall to the air, groundwater, surface water, and surrounding land

I-1b Partial Closure and Final Closure Activities

If partial closure is anticipated, a description of how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure. Also, a description of how and when the facility will be finally closed.

I-1c Maximum Waste Inventory

A description of the maximum inventory of wastes that could be in storage and treatment at any time.

I-1d Inventory Disposal, Removal or Decontamination of Equipment

A description of how all facility equipment and structures will be decontaminated or disposed of when closure is completed.

- o Decontamination procedures
- o Criteria for determining contamination
- o List equipment
- o Disposal of contaminated soil
- o Decontamination of clean up materials and residues
- o Demonstrate decontamination has been effective

I-1d(1) Closure of Containers

A description of how at closure, all hazardous waste residues will be removed from the containment system, and how remaining containers, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed. The description should address the following:

- o Hazardous waste removal and disposal
- o Container removal and recycling.
- o Drum cleaning
- o Drum reconditioning (Pesticides)
- o Container decontamination and disposal
- o Site decontamination and disposal including linings, soil, and washes
- o Verification of decontamination
- o Maximum inventory

I-1d(2) Closure of Tanks

A description of how at closure, all hazardous waste residues will be removed from tanks, discharge control equipment, and discharge confinement structure, and the facility will be decontaminated. The description should address the following:

- o Waste removal from tanks and equipment
- o Decontamination of all components
- o Verification of decontamination
- o Disposal of wastes and residues
- o Maximum inventory

I-1d(3) Closure of Waste Piles

A description of how at closure, all hazardous waste residues will be removed from the pile, and any component of the containment system containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed. The description should address the following:

- o Wet methods for sediment removal
- o Dry methods for sediment removal
- o Sediment dewatering
- o Soil removal
- o Liner removal methods
- o Decontamination of containment system
- o Verification of decontamination
- o Disposal of wastes and residues
- o Maximum inventory
- o Air emission control

I-1d(4) Closure of Surface Impoundments

I-1d(4)a Procedures for removal and/or decontamination of all wastes and materials/equipment associated with the impoundment, or

I-1d(4)b Detailed plans and engineering reports describing

- Elimination of free liquids
- Stabilization of remaining wastes
- Design of final cover demonstrating

  - Liquid migration minimization
  - Function with minimum maintenance
  - Drainage promotion
  - Erosion/abrasion minimization
  - Settling/subsidence accommodation
  - Permeability less than liner or subsoils

I-1d(5) Closure of Incinerators

Description of how at closure all hazardous residues will be removed from the incinerator, associated ductwork, piping, air pollution control equipment, sumps, and any other structures or operating equipment such as pumps, valves, etc., that have come into contact with the hazardous waste. Alternatively, a description of how the incinerator and associated units and equipment will be dismantled and disposed of as a hazardous waste will suffice.

I-1d(6) Specific Closure Plan Requirements for Land Treatment Facilities

- o Procedures to maximize degradation of waste in treatment zone
- o Procedures to minimize waste run-off
- o Run-off system maintenance procedures
- o Wind dispersal control procedures
- o Procedures for compliance with food-chain crop growth
- o Procedures for unsaturated zone monitoring
- o Description of vegetative cover
- o Procedures for establishing vegetative cover

I-1d(7) Closure of Landfills

- o Specific closure plan requirements for landfills

  - Detailed plans and an engineering report which describes the final cover components in detail
  - Documentation that the final cover will

    - Provide long-term minimization of migration of liquids through closed landfill
    - Function with minimum maintenance
    - Promote drainage and minimize erosion/abrasion
    - Settle/subside without losing integrity
    - Be less permeable than bottom liners or subsoils

I-1e Schedule for Closure

A schedule for final closure including:

- o Estimated expected year of closure
- o Closure schedule with total time to close, time for closure activities, and inspection schedule during closure

I-1e(1) Time Allowed for Closure

A schedule for closure which shows

- o All hazardous wastes will be treated, removed off-site, or disposed of on-site within 90 days from receipt of final volume of waste
- o All closure activities will be completed within 180 days from receipt of final volume of waste

I-1e(1)(a) Extensions for Closure Time

A petition made to the Regional Administrator for a schedule for closure which exceeds the 90 days for treatment, removal, or disposal of wastes and/or the 180 days for completion of closure activities made to the Regional Administrator. One of the following must be demonstrated:

- o Closure activities require longer than 180 days
- o Facility has capacity to receive additional wastes
- o A person other than owner or operator will begin operation of the site
- o Closure would be incompatible with continued operation

Demonstrate that all steps have and will be taken to prevent threats to human health and environment from unclosed but inactive facility.

I-1f Closure Plan Amendment

If changes in operating plans or facility design affect the closure plan or the expected year of closure changes, a modification of the closure plan.

I-2 Postclosure

I-2a Surface Impoundment Post Closure

- o Specific post-closure plan requirements for surface impoundments
  - Procedures for maintenance and repair of final cover
  - Procedures for maintenance and monitoring of leak detection system
  - Procedures for maintenance and monitoring of ground water monitoring system
  - Procedures for compliance with Subpart F
  - Procedures for preventing run-on/run-off final cover damage

If wastes are removed submit contingent plan for complying with these factors.

I-2b Specific Post-Closure Plan Requirements for Land Treatment Facilities

- o Procedures to enhance degradation of wastes in treatment zone
- o Procedure for maintaining vegetative cover
- o Procedure for maintaining run-on controls
- o Procedure for maintaining run-off controls
- o Procedures for wind dispersal control
- o Procedures to insure compliance with food-chain crop prohibitions
- o Procedures for unsaturated zone monitoring

I-2c Landfill Post Closure

- o Procedures for maintenance and repair of final cover
- o Monitoring and maintenance procedures for leak detection systems
- o Procedure for leachate collection/removal system operation
- o Procedures to maintain and monitor ground-water monitoring system
- o Procedures for compliance with Subpart F
- o Procedures for preventing final cap erosion due to run-on and run-off
- o Procedures for protection and maintenance of benchmarks
- o Procedures to be undertaken if liquid is found in leak detection system

I-3 Notice in Deed and Notice to Land Authority (Reserved)

I-4 Closure Cost Estimate

A copy of the most recent closure cost estimate, calculated to cover the cost of closure when the cost would be greatest.

- o Cost estimate
- o Fully loaded
- o No salvage credits
- o Current year costs
- o Cost adjusted annually using an inflation factor

I-5 Financial Assurance Mechanism for Closure

A copy of the established financial assurance mechanism for facility closure. The mechanism must be one of the following (I-5(a) through I-5(c) and include due dates and use standard wording.

I-5a Closure Trust Fund

A copy of the closure trust fund agreement with the wording required in 264.151(a)(1) and a formal certification of acknowledgement.

- o Bank or approval institution
- o Mechanics
  - Pay-in period; life of permit
  - Annual payment; unfunded liability divided by years left in pay-in period
  - Release of trust assets in excess of total cost estimate
  - Reimbursement for authorized closure expenditures

I-5b Surety Bond

A surety bond from a federally acceptable surety company meeting one of the following requirements:

- o Surety bond guaranteeing payment into a closure fund. A copy of the surety bond with the wording required in 264.151(b), a copy of the standby trust fund, and a written guarantee that the owner or operator will fund the standby fund at least 60 days before final closure begins and will provide alternate financial assurance if the bond is cancelled.
- o Surety bond guaranteeing performance of closure. A copy of the surety bond with the wording required in Part 264.151 (c), guaranteeing that the owner or operator will perform closure according to the closure plan and the requirements of Subpart H.

I-5c Closure Letter of Credit

A copy of a closure letter of credit with the wording required in 264.151(d)

- o Irrevocable letter of credit
- o At least one year period, automatic renewal
- o Standby trust fund
- o Amount reflects current cost estimate

I-5d Closure Insurance

To demonstrate that the owner or operator has closure insurance, he or she must submit to the Regional Administrator 60 days before hazardous waste is received a certificate of insurance worded as specified in 264.151 (e).

- o Noncancellable policy, automatic renewal
- o Insurer licensed or eligible surplus lines carrier
- o Certificate of insurance
- o Funds available whenever final closure occurs

I-5e Financial Test and Corporate Guarantee for Closure

To demonstrate that this test is met, an owner or operator must submit a letter signed by the company's chief financial officer that is worded as specified in 264.151(f) and meets the following criteria:

- o Tangible net worth $10 million
- o Tangible net worth 6 x all closure and post-closure costs
- o U.S. assets at least 90% of total assets or at least six times all closure and post-closure costs
- o Bond rating requirement or alternative application must include:
  - Copy of a report on the company's latest financial statements drafted by an independent certified public accountant (CPA)
  - Copy of a report from the owner's or operator's independent CPA to the owner or operator stating that he or she has examined the data in the letter from the chief financial officer and has found no reason to change any of the data.

In lieu of the above items, the owner or operator may submit a corporate guarantee worded as required by 264.151(h). This guarantee provides that the guarantor, which must be the parent company of the owner of operator, will perform final closure in accordance with the closure plan if the owner or operator fails to do so or will establish a closure trust fund for the owner or operator. A copy of these items should be submitted with the Part B for review by the permit writer.

I-5f Combination

I-5f(1) Use of Multiple Financial Mechanisms

A copy of a combination of trust fund agreements, surety bond guaranteeing payment into a closure trust fund or letters of credit, insurance, and state assumption of responsibility, which provide financial assurance for the amount of closure. Combined financial assurance must equal or exceed current cost estimate.

I-5f(2) Use of Financial Mechanism for Multiple Facilities

A copy of a financial assurance mechanism for more than one facility showing for each facility, the EPA ID number, name, address, and amount of funds closure assured by the mechanism. A letter of credit may not be used to assure funds in more than one region. Total funding must exceed sum required for each facility considered separately. Documents must be submitted to each Region where facilities are located. Financial test applies to sum of closure and post-closure costs for all facilities.

I-6 Post-Closure Cost Estimate (Reserved)

I-7 Financial Assurance Mechanism for Post-Closure (Reserved)

I-8 Liability Requirements

I-8a Sudden Insurance

Hazardous waste treatment, storage, or disposal facilities must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences.

- o Amount of at least $1 million per occurrence
- o An annual total of at least $2 million

I-8a(1) Coverage for Sudden Accidental Occurrences

A signed duplicate original of the Hazardous Waste facility Liability Endorsement worded as specified in 264.151(i) or a Certificate of Liability Insurance worded as specified in 264.151(j) must be submitted to the Regional Administrator(s) (i.e., if facilities are located in more than one region a duplicate of the endorsement of certificate must be sent to the Administrator in each Region). The financial responsibility levels specified above for liability insurance for sudden accidental occurrences may be adjusted downward if the owner or

operator can prove to the Regional Administrator that these levels are not consistent with the degree and duration of risk at the owner's or operator's facility. Conversely, the Regional Administrator may adjust the levels of financial responsibility up or down, basd on the Administrator's assessment of the degree and duration of risk associated with the facility.

I-8b Nonsudden Insurance

This applies to high risk storage facilities, surface impoundments, land disposal and land treatment.

- o At least $3 million per occurrence
- o An annual total of at least $6 million is required

I-8b(1) Coverage for Nonsudden Accidental Occurrences

Liability insurance for nonsudden occurrences will not be required for tank container or waste pile storage or for incineration facilities unless the Regional Administrator determines that a particular facility of these types poses a significant risk to human health and the environment from nonsudden accidental occurrences. The mechanisms for demonstrating compliance with these requirements are discussed below.

I-8c Financial Test for Liability Insurance

Alternatively, an owner or operator may satisfy the liability requirements by passing a financial test. If he or she takes this route, he or she is required to submit to the Regional Administrator (1) a letter signed by the owner's or operator's chief financial officer worded as specified in 264.151(g), (2) a copy of a report drafted by an independent certified public accountant discussing the owner's or operator's financial statements for the latest fiscal year, and (3) a special report from the owner's or operator's independent CPA stating that he has examined the data in the letter from the chief financial officer and has found nothing that would require any adjustments of the data.

I-8d Variance Procedures

Evaluation of degree and duration of risk sufficient to allow RA to make a judgement on reduction of required liability. The financial responsibility levels specified above for liability insurance for sudden accidental occurrences may be adjusted downward if the owner or operator can prove to the Regional Administrator that these levels are not consistent with the degree and duration of

risk at the owner's or operator's facility. Conversely, the Regional Administrator may adjust the levels of financial responsibility up or down, based on the Administrator's assessment of the degree and duration of risk associated with the facility.

I-9 State Financial Mechanism

I-9a Use of State-Required Mechanisms

Where a state has hazardous waste regulations with equivalent or greater liability requirements for financial assurance for closure and post-closure care, a copy of the state-required financial mechanisms, including the facility EPA ID number, name, address, and amounts of coverage. If a state assumes legal responsibility for compliance with closure, post-closure, or liability requirements or the state assures that the state funds are available to cover those requirements, then facility is in compliance and may include a copy of a letter from the state describing the state assumption of responsibility and including the facility EPA ID number, name, address, and amounts of liability coverage or funds for closure or post-closure care that are assured by the state. If state coverage is less than federal requirements (264.143, 264.145, and 264.147), then the owner or operator must provide demonstration of additional financial assurance mechanisms to equal federal requirements.

a Smithkline company — TELEX 7476
DUNS NO. 00-002-3251
CHEMICAL DIVISION

TAX EXEMPTION NUMBER	NUMBER
76-57-I-50	G- 37381

REFER TO ABOVE NUMBERS ON INVOICES, PACKAGES, BILLS OF LADING, CORRESPONDENCE, ETC.

BFI WASTE SYSTEMS
PUERTO RICO - CHEMICAL WASTE SYSTEMS
BOX 29499
RIO PIEDRAS, PUERTO RICO 00929

SK&F LAB CO. - GUAYAMA
CHEMICAL DIVISION
P.O. BOX 2700
GUAYAMA, P.R. 00655
KM. 14.3, ROUTE 3
GUAYAMA
PUERTO RICO

VENDOR	ORDER DATE	DUE DATE	TERMS
	4/21/83		Per attached documents

F.O.B.	FREIGHT	SHIP VIA
	Per attached documents	

Amendment to Special Waste Disposal Agreement dated May 14, 1982, between BFI and SK&F.

The terms of the Amendment are specified on the attached document and Exhibits.

1,4280.7900

RECEIVED APR 1983 Chemical Waste Systems Southwest Region Houston

ns PR G-14961

1- WE REQUIRE THAT THE SIDE OF EACH CONTAINER SHOWS:
A- NAME OF MATERIAL AS SPECIFIED ON THIS ORDER.
B- MANUFACTURER'S AND SUPPLIER'S NAME.
C- MANUFACTURER'S LOT NUMBER.
D- WEIGHTS (GROSS, TARE & NET) IN METRIC SYSTEM.
E- OUR PURCHASE ORDER SHOWN ABOVE.
F- REFERENCE NUMBER SHOWN ABOVE.
WE RESERVE THE RIGHT TO REFUSE SHIPMENTS IF THE ABOVE INFORMATION IS NOT SHOWN ON THE SIDE OF EACH CONTAINER.

2- WHENEVER POSSIBLE, SUPPLY MATERIAL FROM ONE PRODUCTION LOT.
3- DO NOT MAKE ANY CHANGES INVOLVING MATERIALS, MANUFACTURING PROCEDURES, OR MANUFACTURER OF THIS ITEM WITHOUT PRIOR APPROVAL OF BUYER.
4- MARK CARTONS AND CONTAINERS IN METRIC AND MARK EACH CONTAINER WITH P.O. NUMBER AND OFFICIAL NAME OF MATERIAL.

OUR COMPANY CARRIES BLANKET TRANSPORTATION INSURANCE. ADDITIONAL INSURANCE IS NOT REQUIRED AND WILL NOT BE PAID.

[signature]

Browning-Ferris Industries
CHEMICAL WASTE SYSTEMS

Exhibit A

BFI Waste Code: PR/517/051482/17683
EPA Generator Id. No.: PRD 090613357
EPA Waste Code No.: D-003

WASTE CHARACTERIZATION DATA

General Directions: In order for us to determine whether we can lawfully and safely transport, treat, and dispose of your waste material, we must obtain certain information about the chemical and physical properties of the waste and its chemical composition. Please be complete in your answers; if your response is "none" or "not available", so indicate. Answers must be printed in ink or typewritten and the completed form must be signed. Please make a copy of this form for your records.

Date: September 22, 1982

(1.) Generator Name: SK&F Lab Co.

(2.) Generating Facility Complete Address: Highway #3, Km. 143.0, P. O. Box 2700, Guayama, P. R. 00655

(3.) Authorized Company Representative: Eng. Luis O. Figueroa Title: Technical Services Manager

(4.) Phone Number: (809) 864-4545

(5.) Emergency Contact: David C. Bay Title: President Phone Number: (809) 864-4545

(6.) General Description of The Waste: Wastewater Treatment Sludge

(7.) Process Generating Waste: Industrial Bio Treatment Plant (activated sludge)

(8.) Anticipated volume: 515 ( ) Gallons (X) Tons ( ) Cubic Yards ( ) Drums, or ( ) Other

Per: ( ) Day ( ) Week ( ) Month (X) Year, or ( ) Other

(9.) Waste Properties:

(a.) Vapor pressure (in mm of Hg @ 25 °C): Unk

(b.) Flash Point: 500 (X) °F ( ) °C ( ) Closed Cup ( ) Open Cup

(c.) Phase Layers: (X) Single ( ) Bilayered ( ) Multiphase

(d.) Physical State @ 20 °C: ( ) Solid ( ) Liquid (X) Semi-Solid ( ) Powder ( ) Other

(e.) Solubility (g/100g H2O) @ 25 °C: Unk

(f.) pH: 5.0 - 9.0

(g.) Density: 9.0 - 10.0 ( ) lb/gal (X) lb/cf ( ) Other

(h.) Odor: ( ) Strong (X) Mild ( ) None

(i.) Reactivity: Gases evolved at pH range 4.0 - 6.0 (H_2S)

Hydrolyzes: ( ) Yes (X) No Autopolymerizes: ( ) Yes (X) No Shock Sensitive: ( ) Yes (X) No

Pyrophoric: ( ) Yes (X) No Thermally Sensitive: ( ) Yes (X) No Explosive: ( ) Yes (X) No

(10.) Complete waste composition (with ranges - indicate % or ppm.) Attach Additional Pages if Necessary

ORGANIC			INORGANIC
Metals Range (mg/l)			80-90% water (moisture)
As 0-10	Cr 0-2.0	Se 0-0.8	10 - 20% Solids (dead buos)
Ba 0-10.0	Pb 0-1.0	Ag 0-1.0	TOC -- 0.5 - 1.3% (isopropyl alcohol)
Cd 0-0.8	Hg 0-0.15		

Note: May have free water; if so, subject to kiln dust surcharge

(11.) Required marking, labeling, and placarding: ( ) Flammable ( ) Combustible ( ) Poison A ( ) Poison B ( ) Corrosive ( ) Oxidizer

(12.) Sample Included: X

(13.) Does this waste contain biological materials, pathogens or etiological agents? No If yes, please specify.

(14.) Have you obtained toxicity studies of this waste material? Yes If so, please attach a copy of the results.

(15.) Required personnel protective equipment & procedures. (Please attach additional pages if necessary.)

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exists and that all known or suspected hazards have been disclosed.

Generator's Authorized Signatory: Luis O. Figueroa, P.E. Title: Technical Services Manager Date: September 22, 1982

Confidentiality Agreement: As consideration for the Generator's release of the above information and any other supplemental data, the undersigned agrees to treat such information as confidential property and will not disclose such information to others except as is required by law, and in such circumstances only after first giving notice to the Generator.

By: _____ Title: District Sales Mgr

Name

BFI Houston Lab Distributes:
DISPOSAL SITE - white copy TRANSPORTATION - pink copy REGIONAL OFFICE - yellow copy LAB - pink copy SALES OFFICE - gold copy

a SmithKline company TELEX 7478
CHEMICAL DIVISION
DUNS NO. 00-002-3251

TAX EXEMPTION NUMBER	NUMBER
76-57-I-50	G- 37381

REFER TO ABOVE NUMBERS ON INVOICES, PACKAGES, BILLS OF LADING, CORRESPONDENCE, ETC.

BFI WASTE SYSTEMS
PUERTO RICO - CHEMICAL WASTE SYSTEMS
BOX 29499
RIO PIEDRAS, PUERTO RICO 00929

SK&F LAB CO. - GUAYAMA
CHEMICAL DIVISION

P.O. BOX 2700
GUAYAMA, P.R. 00655

KM. 14.3, ROUTE 3
GUAYAMA
PUERTO RICO

VENDOR	ORDER DATE	DUE DATE	TERMS
	4/21/83		Per attached documents

F.O.B.	FREIGHT	SHIP VIA
Per attached documents		

Amendment to Special Waste Disposal Agreement dated May 14, 1982, between BFI and SK&F.

1,4280,7900

The terms of the Amendment are specified on the attached document and Exhibits.

ns PR G-14961

RECEIVED

1. WE REQUIRE THAT THE SIDE OF EACH CONTAINER SHOWS:
A. NAME OF MATERIAL AS SPECIFIED ON THIS ORDER.
B. MANUFACTURER'S AND SUPPLIER'S NAME.
C. MANUFACTURER'S LOT NUMBER.
D. WEIGHTS (GROSS, TARE & NET) IN METRIC SYSTEM.
E. OUR PURCHASE ORDER NUMBER.
F. REFERENCE NUMBER SHOWN ABOVE (*)
WE RESERVE THE RIGHT TO REFUSE SHIPMENTS IF THE ABOVE INFORMATION IS NOT SHOWN ON THE SIDE OF EACH CONTAINER.

2. WHENEVER POSSIBLE, SUPPLY MATERIAL FROM ONE PRODUCTION LOT.
3. DO NOT MAKE ANY CHANGES INVOLVING MATERIALS, MANUFACTURING PROCEDURES, OR MANUFACTURER OF THIS ITEM WITHOUT PRIOR APPROVAL OF BUYER.
4. MARK PAPERS AND CONTAINERS IN METRIC AND MARK EACH CONTAINER WITH P.O. NUMBER AND OFFICIAL NAME OF MATERIAL.

OUR COMPANY CARRIES BLANKET TRANSPORTATION INSURANCE. ADDITIONAL INSURANCE IS NOT REQUIRED AND WILL NOT BE PAID.

[signature]

Browning-Ferris Industries
CHEMICAL WASTE SYSTEMS

Exhibit A

BFI Waste Code: PR/517/051482/17683
EPA Generator Id. No.: PRD 090613357
EPA Waste Code No.: D-003

WASTE CHARACTERIZATION DATA

General Directions: In order for us to determine whether we can lawfully and safely transport, treat, and dispose of your waste material, we must obtain certain information about the chemical and physical properties of the waste and its chemical composition. Please be complete in your answers; if your response is "none" or "not available", so indicate. Answers must be printed in ink or typewritten and the completed form must be signed. Please make a copy of this form for your records.

Date: September 22, 1982

(1.) Generator Name: SKF Lab Co.

(2.) Generating Facility Complete Address: Highway #3, Km. 143.0, P. O. Box 2700, Guayama, P. R. 00655

(3.) Authorized Company Representative: Eng. Luis O. Figueros Title: Technical Services Manager

(4.) Phone Number: (809) 864-4545

(5.) Emergency Contact: David C. Bay Title: President Phone Number: (809) 864-4545

(6.) General Description of The Waste: Wastewater Treatment Sludge

(7.) Process Generating Waste: Industrial Bio Treatment Plant (activated sludge)

(8.) Anticipated volume: 515 ( ) Gallons (X) Tons ( ) Cubic Yards ( ) Drums, or ( ) Other

Per: ( ) Day ( ) Week ( ) Month (X) Year, or ( ) Other

(9.) Waste Properties:

(a.) Vapor pressure (in mm of Hg @ 25 °C): Unk

(b.) Flash Point: 500 (X) °F ( ) °C ( ) Closed Cup ( ) Open Cup

(c.) Phase Layers: (X) Single ( ) Bilayered ( ) Multilayer

(d.) Physical State @ 20 °C: ( ) Solid ( ) Liquid (X) Semi-Solid ( ) Powder ( ) Other

(e.) Solubility (g/100g H2O @ 20 °C): Unk

(f.) pH: 5.0 - 9.0
9.0 - 10.0

(g.) Density: ( ) lb/gal (X) lb/ft³ ( ) Other

(h.) Odor: ( ) Strong (X) Mild ( ) None

(i.) Reactivity: Gases evolved at pH range 4.0 - 6.0 (H_2S)
Hydrogen: ( ) Yes (X) No Autopolymerization: ( ) Yes (X) No Shock Sensitive: ( ) Yes (X) No
Pyrophoric: ( ) Yes (X) No Thermally Sensitive: ( ) Yes (X) No Explosive: ( ) Yes (X) No

(10.) Complete waste composition (with ranges - indicate % or ppm): Attach Additional Pages if Necessary

Metals Range (mg/l)				ORGANIC		INORGANIC
As	0-10	Cr	0-2.0	Se	0-0.8	80-90% water (moisture)
Ba	0-10.0	Pb	0-1.0	Ag	0-1.0	10 - 20% Solids (dead bugs)
Cd	0-0.8	Hg	0-0.15			TOC -- 0.5 - 1.3% (isopropyl alcohol)

Note: May have free water; if so, subject to kiln dust surcharge

(11.) Required mixing, grinding, and pretreating: ( ) Flammable ( ) Combustible ( ) Class A ( ) Class B ( ) Corrosive ( ) Oxidizer

(12.) Sample Included: No

(13.) Does this waste contain biological materials, pathogens or etiological agents? No If yes, please specify.

(14.) Have you obtained toxicity studies of this waste material? Yes If so, please attach a copy of the results.

(15.) Required personal protective equipment & procedures. (Please attach additional pages if necessary.)

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exists and that all known or suspected hazards have been disclosed.

Generator's Authorized Signature: [signature] Title: Technical Services Manager Date: September 22, 1982

Luis O. Figueros, P.E.

Confidentiality Statement: As consideration for the Generator's release of the above information and any other supplemental data, the undersigned agrees to treat such information as confidential property and will not disclose such information to others except as is required by law, and in such circumstances only after first giving notice to the Generator.

By: [signature] Name

Title: District Sales Mgr

BFI Houston Lab Distribution:
DISPOSAL SITE - white copy TRANSPORTATION - pink copy REGIONAL OFFICE - yellow copy LAB - pink copy SALES OFFICE - gold copy

EXHIBIT B

To Special Waste Disposal Agreement
Dated May 14, 1982, Between
BFI and SKF Laboratories.

SERVICES AND EQUIPMENT

Browning-Ferris Industries will provide all labor, equipment and materials necessary to:

1 - Deliquify in place the Waste Material using Kiln Dust.

2 - Remove all Waste Material from the Waste Site, as well as the hypalon liner and any contaminated soil underlying and/or surrounding the Waste Site, as identified by SKF.

3 - Load and transport all Waste Material, the hypalon liner and contaminated soil in 40 ft. lined vans to the dock at Ponce, Puerto Rico in accordance with the legal requirements referenced in Exhibit C of this Agreement.

4 - Load and transport all Waste Material, the hypalon liner and contaminated soil from the dock at Ponce via authorized barge to Port Arthur, Louisiana and from Port Arthur, Louisiana via lined vans to BFI's Calcasieu disposal facility in Westlake, Louisiana, in accordance with the legal requirements referenced in Exhibit C of this Agreement.

5 - Dispose of all Waste Material, the hypalon liner and contaminated soil via direct burial at BFI's Calcasieu disposal facility in Westlake, Louisiana in accordance with the legal requirements referenced in Exhibit C of this Agreement.

6 - Restore the Waste Site to its original contours, eliminating all surface impoundment areas.

INITIALLED FOR IDENTIFICATION

BFI

David C Bay

CUSTOMER

EXHIBIT C

To Special Waste Disposal Agreement
Dated May 14, 1982, Between
BFI and SKF Laboratories.

COLLECTION AND TRANSPORTATION

A. Schedule

BFI will make every reasonable effort to collect and transport the Waste Material, hypalon liner and contaminated soil upon 15 days prior notice.

B. Other Conditions: BFI agrees:

1) to perform all of the collection and transportation services set forth in Exhibit B of this Agreement in accordance with all applicable provisions of the Resource Conservation and Recovery Act, 42 U.S.C. §3251 et seq. and the regulations promulgated thereunder and pursuant to any other applicable laws, rules, ordinances, orders, permits, authorizations and regulations promulgated by any office, agency, legislative or judicial branch of the United States government and/or the Commonwealth of Puerto Rico;

2) to exercise reasonable care in collecting and transporting the Waste Material, hypalon liner and contaminated soil;

3) not to create or take any actions likely to cause any unsafe conditions or risk of harm to public health or the environment, in the course of performing its obligations hereunder;

4) to permit SKF and/or its representatives and/or designees to inspect and verify the services provided by BFI as described in Exhibits B and D attached hereto, both at the Waste Site and at BFI's Calcasieu waste disposal facility.

INITIALLED FOR IDENTIFICATION

BFI

David C Bay

CUSTOMER